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CHURCH OF SCIENTOLOGY
12 INTERNATIONAL

13
14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 FOR THE COUNTY OF MARIN

16 CHURCH OF SCIENTOLOGY)
INTERNATIONAL, a California not-for-profit)
17 religious corporation,)

18)
19)
20 Plaintiff,)

21 vs.)

22)
23)
24 GERALD ARMSTRONG; DOES 1 through 25,)
inclusive,)

25)
26 Defendants.)

CASE NO. 157 680

[CONSOLIDATED]

DECLARATION OF KENNETH D.
LONG IN SUPPORT OF
PLAINTIFF'S REPLY IN SUPPORT
OF MOTION FOR SUMMARY
ADJUDICATION OF THE
FOURTH, SIXTH AND ELEVENTH
CAUSES OF ACTION OF
PLAINTIFF'S SECOND AMENDED
COMPLAINT

DATE: January 27, 1995
TIME: 9:00 a.m.
DEPT: 1

TRIAL DATE: May 18, 1995

RECEIVED

JAN 23 1995

HUB LAW OFFICES

1 I, KENNETH D. LONG, hereby state:

2 1. I am a staff member in the Legal Bureau of the Church of Scientology International,
3 in which I perform the functions of a paralegal. From 1980 through June, 1992, I was a staff
4 member of the Church of Scientology of California and worked as a paralegal in the Legal
5 Bureau of that Church.

6 2. Since August 1982, I have worked in a paralegal capacity on legal matters relating to
7 Gerald Armstrong. Through the course of this work, I have studied the documents pertaining to
8 legal matters involving Gerald Armstrong, have assisted counsel in the taking of depositions of
9 Gerald Armstrong, and have worked on cases and trials either directly involving Gerald
10 Armstrong or in which Armstrong testified. I am familiar with the proceedings in the case of
11 Church of Scientology vs. Gerald Armstrong, L.A.S.C. Case No. C420153. I am also familiar
12 with the press and media attention which Armstrong obtained prior to the settlement. Further, I
13 am familiar with the releases signed by Vicki and Richard Aznaran. It is based on the above
14 knowledge and experience that I make this declaration and if called upon to do so, I could and
15 would competently testify thereto.

16 3. At the time that the Aznarans signed release agreements, they were employees of a
17 Church-related entity, and had decided to leave that employment. They had not publicly
18 attacked any Church of Scientology, had not testified on behalf of any anti-Church litigant, and
19 were not themselves anti-Church litigants at the time that they signed the releases.

20 4. At the time the Church settled with Armstrong, Armstrong was both an anti-Church
21 litigant and a professional witness against the Church in other litigation. He was also a
22 paralegal who worked extensively on anti-Church cases, and a self-designated public relations
23 man who gave interviews to many reporters for sensationalist journals.

24 5. Prior to December 1986, Armstrong had testified in 15 cases, including his own, for
25 a total of 28 trial days, attacking the Church of Scientology and related entities and individuals.

26 6. Prior to December, 1986, Armstrong had been deposed for 19 days, and had executed
27 28 declarations in 15 cases, attacking the Church of Scientology and related entities and
28 individuals.

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7. Before December, 1986 Armstrong appeared on more than 10 television and radio programs, attacking the Church of Scientology and related entities and individuals. In October, 1986, Armstrong was interviewed at length on the television program 2020.

8. Before December, 1986, more than 76 stories about Armstrong appeared in United States newspapers. In these articles, too, Armstrong attacked the Church and related entities and individuals.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 19th day of January, 1995, at Los Angeles, California.

Kenneth D. Long
KENNETH D. LONG

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Los Angeles, CA 90028.

On January 20, 1995, I served the foregoing document described as DECLARATION OF KENNETH D. LONG IN SUPPORT OF PLAINTIFF'S REPLY IN SUPPORT OF MOTION FOR SUMMARY ADJUDICATION OF THE FOURTH, SIXTH AND ELEVENTH CAUSES OF ACTION OF PLAINTIFF'S SECOND AMENDED COMPLAINT on interested parties in this action,

by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

by placing the original true copies thereof in sealed envelopes addressed as follows:

FORD GREENE
HUB Law Offices
711 Sir Francis Drake Blvd.
San Anselmo, CA 94960-1949

MICHAEL WALTON
700 Larkspur Landing Circle
Suite 120
Larkspur, CA 94939

BY MAIL

*I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal

cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

Executed on January 20, 1995 at Los Angeles, California.

**(BY PERSONAL SERVICE) I delivered such envelopes by hand to the offices of the addressees.

Executed on _____ at Los Angeles, California.

(State) I declare under penalty of the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Print or Type Name

Signature

* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

** (For personal service signature must be that of messenger)